UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON

AT TACOMA

The Honorable J. Kelley Arnold

STANLEY WI	LLMS, and JOYCEWILLN	MS,)
a marital community,) No COS 57541VA
Plaintiffs,) No. C05-5754JKA)
VS.) AGREED PROTECTION) ORDER, RE; MEDICAL
GEORGIA-PACIFIC, Inc.,) RECORDS
Defendant.)

THE COURT, upon Agreement of the Petitioner, Stanley Willms, by and through her attorney of record, Michael Hanbey, with the Defendants being represented by Jim A. Harmony, Assistant Attorney General, having reviewed the files and records in this matter, and having determined that discovery pursuant to statute and court rule may proceed, NOW

ORDERS, ADJUDGES AND DECREES that:

- 1. The health care records of the Plaintiff, Stanley Willms shall be produced to counsel for the Defendants after Defendants comply with the Uniform Health Care Act, Chapter 70.02. RCW, requirements;
 - 2. The discovery of the health care records of the Plaintiff, Stanley Willms,

Wm. Michael Hanbey, PS Attorney at Law P.O. Box 2575 Olympia, WA 98507

PROTECTION ORDER,
RE: MEDICAL RECORDS - 1

Case 3:05-cv-05754-JKA Document 14 Filed 08/23/06 Page 2 of 2

obtained by Counsel for the Defendant may be shared with and reviewed by the Defendant and/or their representatives, but any records related to health care received by the Plaintiff Stanley Willms

IS and the SAME SHALL BE PROTECTED from delivery, transferal or dissemination in any physical or electronic form to the Defendant and/or their representatives (except experts hired by counsel for the Defendant); PROVIDED, the Defendant and/or their representatives may, in assisting legal counsel at deposition or in a court proceeding, review or have contact with copies of the health care records.

Counsel for Defendant IS and the SAME SHALL BE PROHIBITED FROM

3. Counsel for Defendant IS and the SAME SHALL BE PROHIBITED FROM delivering, transferring or disseminating copies of the health care records of the Plaintiff, Stanley Willms, to any person who is not a member of the staff of legal counsel for Defendant or an expert engaged to review, analyze or testify about the health care records of the Plaintiff, Stanley Willms unless there is further order of the court.

DATED the 23rd day of August, 2006.

17 /s/ J. Kelley Arnold 18 U.S. Magistrate Judge 19 20 Presented by: Approved as to Form and Content; 21 Notice of Presentation Waived: 22 23 24 Michael Hanbey, WSB# 7829 Kristin L. Bremer, OSB # 03274 25 Attorney for Plaintiffs Attorney for Defendant 26

Wm. Michael Hanbey, PS
Attorney at Law
P.O. Box 2575
Olympia, WA 98507

PROTECTION ORDER,
RE: MEDICAL RECORDS - 2

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